

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

RHEE BROS., INC.

*

Plaintiff

*

CIVIL ACTION NO. AMD 01CV 1894

v.

*

HAN AH REUM, Corp., et al

*

Defendants

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**STIPULATION FOR ENTRY OF PERMANENT INJUNCTION
AND DISMISSAL**

Plaintiff, Rhee Bros., Inc., ("Plaintiff") and Defendants (1) Seoul Shik Poom, Inc. and (2) Joong Kwon (jointly and severally "Defendants"), submit this Stipulation for Entry of Consent Permanent Injunction and Dismissal.

STIPULATION

On or about June 27, 2001, Plaintiff filed this action, titled Rhee Bros., Inc. v. Han Ah Reum, Corp., et al., AMD-01CV1894, in the United States District Court for the District of Maryland, against the Defendants¹, seeking damages and injunctive relief for alleged trademark infringement ("this Action"). On or about October 29, 2001, Defendants filed their Answer and Counterclaim against Plaintiff. On or about January 4, 2002, Plaintiff filed its Amended Complaint. On or about February 20, 2002, Defendants filed their Amended Answer and Counterclaim. Defendants, without admitting or denying the alleged infringing activities in the Complaint and Amended Complaint, desire to settle all disputes with Plaintiff.

1. Without admitting or denying the alleged infringing activities in the Complaint and in the Amended Complaint, Defendants, together with their agents, employees, and those acting in concert or with them who have authority to manage and control their business activities, stipulate and agree to be permanently enjoined and restrained from offering, selling, marketing, distributing and/or otherwise promoting, directly or indirectly,
 - a) products manufactured or packaged by Seoul Shik Poom, Inc., using the Plaintiff's trademark "Soon Chang Chap Sal Hot Bean Paste" under the brand name of Choripdong or any other brand name, and
 - b) any products manufactured, supplied or distributed by any third party using the Plaintiff's trademark "Soon Chang Chap Sal Hot Bean Paste."
2. Plaintiff stipulates and agrees that all claims alleged in the Plaintiff's Complaint and Amended Complaint against Defendants shall be and are dismissed from this action with prejudice.
3. Defendants stipulate and agree that all counterclaims alleged in the Defendants' Answer and Counterclaim, and Amended Answer and Counterclaim against Plaintiff shall be and are dismissed from this action with prejudice.
4. The Parties stipulate and agree that the Court shall retain jurisdiction of the action to entertain such further proceedings and to enter such further orders as may be necessary or appropriate to implement and/or enforce the provisions of this Order and the Parties' Confidential Settlement Agreement, which is incorporated by reference, and that this Order may be modified or vacated pursuant to the terms of the Confidential Settlement Agreement.

Respectfully submitted,

¹ Other defendants include HAR Wheaton, Inc., t/a Han Ah Reum, Han Ah Reum Corp., t/a Han Ah Reum, Il Yeon Kwon, individually (hereinafter jointly and severally "Defendant HAR").

Dated:

/s/

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/s/*

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Attorneys for Defendants Seoul Shik Poom,
Inc. and Joong Kwon

*see attached signature